

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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MINNEAPOLIS FIREFIGHTERS' RELIEF )  
ASSOCIATION, )

Plaintiffs, )

-v- )

MEDTRONIC, INC., ARTHUR D. )  
COLLINS, JR., WILLIAM A. HAWKINS, )  
and GARY L. ELLIS, )

Defendants. )

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Case No. 08-cv-6324 (PAM)(AJB)

**DECLARATION OF PATRICK S. WILLIAMS IN OPPOSITION TO  
PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND  
RESPONSES TO INTERROGATORIES**

Patrick S. Williams declares under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am a partner in the firm of Briggs and Morgan, P.A., and am one of the counsel for Defendants in the above-captioned matter.
2. I submit this Declaration in Opposition To Plaintiffs' Motion to Compel.
3. Attached hereto as Exhibit 1 is a true and correct copy of Medtronic, Inc. Form 10-K filed June 28, 2006.
4. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiffs' Second Set of Requests for the Production of Documents Directed to Defendants Medtronic, Inc., Arthur D. Collins, William A. Hawkins and Gary L. Ellis.

5. Attached hereto as Exhibit 3 is a true and correct copy of Lead Plaintiffs' First Set of Requests for the Production of Documents Directed to Defendants Medtronic, Inc., Arthur D. Collins, William A. Hawkins and Gary L. Ellis.

Dated: December 14, 2011

/s/ Patrick S. Williams  
Patrick S. Williams